## **BAKER & HOSTETLER LLP**

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Attorneys for Irving H. Picard, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and the Estate of Bernard L. Madoff

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff,

V.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively Consolidated SIPA Liquidation of Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

AVRAM J. GOLDBERG, individually and in his capacity as trust officer for The Sidney R. Rabb Trust FBO Carol Goldberg,

CAROL R. GOLDBERG, individually and in her

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05439 (SMB)

capacity as trustee of The Sidney R. Rabb Trust FBO Carol Goldberg,

M. GORDON EHRLICH, in his capacity as trustee of The Sidney R. Rabb Trust FBO Carol Goldberg, and as attorney-in-fact for Carol R. Goldberg, Avram J. Goldberg, and the Carol R. Goldberg and Avram J. Goldberg Special Account,

SIDNEY R. RABB TRUST FBO CAROL GOLDBERG, and

THE AVCAR GROUP LTD.,

Defendants.

## SECOND AMENDED CASE MANAGEMENT NOTICE

PLEASE TAKE NOTICE, that pursuant to the Order (1) Establishing Litigation Case Management Procedures for Avoidance Actions and (2) Amending the February 16, 2010 Protective Order (the "Order") [Dkt. No. 3141] entered by the Bankruptcy Court in the above captioned SIPA liquidation, Adv. Pro. No. 08-01789 (SMB), on November 10, 2010, the following deadlines are hereby made applicable to this adversary proceeding:

- 1. Fact Discovery shall be completed by: June 30, 2017.
- 2. The Disclosure of Case-in-Chief Experts shall be due: September 27, 2017.
- 3. The Disclosure of Rebuttal Experts shall be due: October 27, 2017.
- 4. The Deadline for Completion of Expert Discovery shall be: November 27, 2017.
- 5. The Deadline for Service of a Notice of Mediation Referral shall be: On or before December 4, 2017.
- 6. The Deadline to Choose a Mediator and File a Notice of Mediator Selection shall be: On or before December 11, 2017.
- 7. The Deadline for Conclusion of Mediation shall be: On or before April 9, 2018.

Dated: New York, New York

March 21, 2017

Of Counsel:

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